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ORGANIC PROGRAM

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National Organic Standards Board
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PETITION WITH CBI DELETED:
CONFIDENTIAL BUSINESS INFORMATION DELETED
ADDITION OF "CHIPOTLE CHILE PEPPERS" TO 205.606

This petition requests that "Chipotle Chile Peppers (Smoked Chile Peppers)" be added to the National List under 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic". As far as we know, this agricultural substance is currently unavailable as organic in the quantities we require. Addition of this item to 205.606 would allow for the substitution of conventional chipotle chile peppers in the instances when organic is unavailable or organic supplies are unacceptable for the intended use.

Substance Name: Chipotle chile peppers can be produced by starting with a range of chile peppers, generally *Capsicum annuum* L. but *Capsicum frutescens* L. is also used. These chiles are naturally smoked to both preserve the chile pepper and to impart a desirable smoky flavor to the product. Attachment 1 provides information about the types and forms of chipotle chile peppers.

Safety Information: Capsicum (*Capsicum frutescens* L. or *Capsicum annuum* L.) is on the FDA GRAS (Generally Recognized as Safe) list under CFR 21 Sec. 182.10 Spices and other natural seasonings and flavorings.

Intended Use: Chipotle chile peppers are currently used by Amy's Kitchen to add a distinct smoky, spicy flavor note to several foods including salsas, soups and burritos.





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May 17, 2006

Page 2

Source and Manufacture: Chipotle chile peppers are manufactured by growing, harvesting, sorting and smoking chile peppers. Details are provided in Attachment 2.

At the present time, we are not aware of any source of organic chipotle chile peppers in the quantity we require for manufacturing proposes. There are probably small quantities available, however, we know of no food ingredient supplier offering this item as organic. There are no suppliers for chipotle chile peppers listed in the Organic Pages On-Line.

CBI Deleted

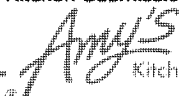
Justification Statement: We believe reasonable quantities of organic chipotle chile peppers will become available in the next few years because they impart a flavor that has become very popular. Attachment 3 provides further details on the demand for chipotle chile peppers. At the present time, however, supplies of organic chipotle chile peppers are limited and insufficient for manufacture of large quantities of "Organic" finished foods.

Conclusion: In order to maintain the flavor profile that Amy's Kitchen's customers desire and expect, we request that "Chipotle Chile Peppers (Smoked Chile Peppers)" be added to the National List under 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic". Amy's Kitchen intends to use organic chipotle chile peppers when supplies are available that have been appropriately harvested, selected and smoked to meet our target flavor profile. When an organic source is not available that meets these requirements, we will provide information to our certifier QAI detailing our attempts to source organic and we will request to use conventional chipotle chile peppers. While using a conventional source, we will aggressively continue to attempt to source an acceptable organic version.

Respectfully submitted:

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ATTACHMENT 1

TYPES AND FORMS OF CHIPOTLE CHILI PEPPERS

Chipotle

From Wikipedia, the free encyclopedia



Heat : Hot

Chipotles are smoke-dried chile peppers, usually moritas, used for cooking Mexican- and Mexican-inspired cuisine. The chiles were originally smoke-dried because thick-skinned chiles do not air-dry well. Today, these peppers are typically smoked in for a period of several days followed by a later drying period. When dry, they are 2–3 inches long and 1 inch wide with a tan, wrinkled skin. Chipotles can be purchased in dried form, or canned and preserved in adobo sauce. Ten pounds of fresh chiles will yield approximately one pound of dried chipotle peppers when the process is complete.

Tierra Vegetables is a significant American producer of chipotle peppers (1000 lbs per year). They smoke-dry a variety of peppers including red jalapeños, serranos, habaneros, New Mexican chiles, Hungarian wax chiles, Santa Fe Grande chiles, and a milder jalapeño called the TAM (a cultivar named for Texas A&M University). Other varieties of smoked chiles include: Cobán, a piquín chile native to southern Mexico and Guatemala; Pasilla de Oaxaca: a variety of pasilla chile from Oaxaca used in mole negro; Jalapeño chico: jalapeños, smoked while still green; and, Capones: These are a rare smoked red jalapeño without seeds; Capone means "castrated ones." They are quite expensive.

Chipotles are a key ingredient that impart a relatively mild but earthy spiciness to many dishes in Mexican cuisine. The chiles are used to make various salsas, which are used to season a wide variety of dishes.

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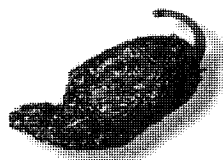
ATTACHMENT 1

TYPES AND FORMS OF CHIPOTLE CHILI PEPPERS

Pepper Profile: Chipotles

by Dave DeWitt and Chuck Evans

Information Source: http://www.fiery-foods.com/dave/profile_chipotles.html#Commercial%20Products



Varieties

The true chipotle is grayish-tan, quite stiff, and is often described as looking like a cigar butt. It is deeply imbued with smoke and is both hot and flavorful. This main variety is also called *chile ahumado* (smoked chile); *chile meco* (blackish-red chile; *meco* is close to *seco*, meaning dry); the double terms *chipotle meco* and *chipotle típico*, and just *típico*. Further confusing the issue is a cultivated variety of jalapeño that is also named 'Típico.' Yes, the 'Típico' variety is often smoked to become a *típico chipotle*.

Other varieties of smoked jalapeños are often mistaken for the *típico* chipotle. The most common one is called *morita*, which means "little blackberry" in Spanish. The color of this smoked chile is dark red, sometimes approaching purple in color. Often the *morita* is referred to as a smoked serrano chile, but this is inaccurate. Both the *típico* and the *morita* are smoked jalapeños; the difference is that the *morita* is not smoked nearly as long, and thus it remains very leathery and pliable. Not only is the smoky flavor much more intense in the *típico*, its flavor is much richer.

But the *morita* is commonly marketed as the *típico* chipotle because it can bring \$2 to \$4 more per pound with that name. Unfortunately, most of the "chipotles" being sold in markets in the United States are in actuality the inferior *moritas*. This is because most of the chipotles produced in Mexico are eaten there, leaving little for export.

To make up for lack of the *típico* variety to export, producers in the northern states of Mexico, particularly Chihuahua, have turned to the *moritas*, which are much less expensive to produce. Unfortunately, they call the *moritas* "chipotles" and sometimes claim that they have never heard of the *típico* variety. To further confuse the issue, in the interior, the *típico* is known by brokers as "Veracruz."

Other varieties of smoked chiles include:

Cobán: a piquín chile that is smoked in southern Mexico and Guatemala.

Pasilla de Oaxaca: a variety of pasilla chile that is smoked in Oaxaca and is used in the famous *mole negro*.

Jalapeño chico: jalapeños that are smoked while still green. Usually, they are culls from the fresh market that need to be preserved, and the smoke-drying process obscures any blemishes.

ATTACHMENT 1

TYPES AND FORMS OF CHIPOTLE CHILI PEPPERS

Capones: This rare smoked chile is a red jalapeño without seeds; the term means "castrated ones." They are quite expensive and are rarely exported.

Habanero: recently, a smoked habanero product has been introduced into the United States. It is used as a very hot substitute for any chipotle.

Heat Scale

Of course, the heat scale of smoked chiles varies considerably. The *coban* and habaneros are the hottest of the smoked chiles and the *morita* and *típico* are the mildest. Since jalapeños themselves have medium heat, when smoked they retain the same heat level, which ranges from about 5,000 to 10,000 Scoville Units, measured in the dried form. By comparison, New Mexican chiles are typically 500 to 1,000 Scoville Units, and habaneros range from 80,000 to more than 300,000 Scoville Units. When many chipotles are added to a dish, the result can be quite pungent.

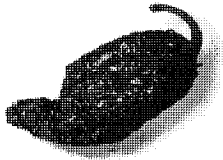
ATTACHMENT 2

DETAILED INFORMATION ON CHIPOTLE CHILI PEPPERS INCLUDING PRODUCTION METHODS

Pepper Profile: Chipotles

by Dave DeWitt and Chuck Evans

Information Source: http://www.fiery-foods.com/dave/profile_chipotles.html#Commercial%20Products



Smoking

Why did Native Americans smoke chiles in the first place? Perhaps some thick-fleshed chiles such as early jalapeños were dropped near the communal fire and later, a leathery, preserved chile was the result. Since smoking is believed (along with salting) to be one of the earliest preservation methods, it would make sense that the "meaty" chiles could be smoked right along with the meat.

In the town of Delicias in northern Mexico, the red jalapeños are smoked in a large pit on a rack made out of wood, bamboo, or metal. Another nearby pit contains the fire and is connected to the smoking pit by an underground tunnel. The pods are placed on top of the rack where drafts of air pull the smoke up and over the pods. A farm may have a smoker of a different design at the edge of the fields, and it may be a fireplace of bricks with grates at the top and a firebox below. This smoker is for small batches.

There are five keys to the quality of the homemade chipotles: the maturity and quality of the pods, the moisture in the pods, the type of wood used to create the smoke, the temperature of the smoke drying the pods, and the amount of time the fruits are exposed to the smoke and heat. But remember that smoking is an art, so variations are to be expected and even desired.

Recommended woods are from fruit trees or other hardwoods such as hickory, oak, and pecan. Pecan is used extensively in parts of Mexico and in southern New Mexico to flavor chipotle. Although mesquite is a smoke source in Mexico, we prefer the less greasy hardwoods. Mesquite charcoal (not briquets) is acceptable, and hardwood chips, especially when soaked, can be placed on top to create even more smoke. It is possible, however that the resinous mesquite smoke (from the wood, not charcoal) contributes to the tan-brown coloration of the *típico* variety of chipotle.

Wash all the pods and discard any that have insect damage, bruises, or are soft, and remove the stems from the pods. Start two small fires on each side of the barbecue bowl, preferably using one of the recommended hardwoods. If you are using a meat smoker with a separate firebox, simply build the fire in the firebox.

Place the pods in a single layer on the grill rack so they fit between the two fires. For quicker smoking, cut the pods in half lengthwise and remove the seeds. Keep the fires small and never expose the pods directly to the fire so they won't dry unevenly or burn. The intention is to dry the pods slowly while flavoring them with smoke. If you are using charcoal briquets, soak hardwood chips in water before placing them on the coals so the wood will burn slower and create more smoke. The barbecue vents

ATTACHMENT 2

DETAILED INFORMATION ON CHIPOTLE CHILI PEPPERS INCLUDING PRODUCTION METHODS

should be opened only partially to allow a small amount of air to enter the barbecue, thus preventing the fires from burning too fast and creating too much heat.

Check the pods, the fires, and the chips hourly and move the pods around, always keeping them away from the fires. It may take up to forty-eight hours to dry the pods completely, which means that your fire will probably burn down during the night and will need to be restoked in the morning. When dried properly, the pods will be hard, light in weight, and brown in color. After the pods have dried, remove them from the grill and let them cool. To preserve their flavor, place them in a zip-lock bag.

Ten pounds of fresh jalapeños yield just one pound of chipotles after the smoking process is complete. A pound of chipotle goes a long way, as a single pod is usually enough to flavor a dish.

A quick smoking technique involves drying red jalapeños (sliced lengthwise, seeds removed) in a dehydrator or in an oven with just the pilot light on. They should be desiccated but not stiff. Then smoke them for three hours over fruitwood in a traditional smoker with a separate firebox, or in the Weber-style barbecue as described above. This technique separates the drying from the smoking so you spend less time fueling the smoker.

Obviously, the Mexicans have perfected the *típico* technique, while we Americans are struggling to duplicate it with more modern equipment. There is a delicate balance of the pit temperature, the amount of smoke, the type of smoke, and the length of time that produces the perfect chipotle.

ATTACHMENT 3

NOTE: These articles indicate that chipotle chile peppers have a unique flavor profile and that the demand for products containing chipotle chile peppers is increasing.


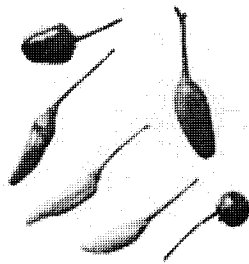
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PREPARED FOODS

Information Source:

<http://www.preparedfoods.com/CDA/Archives/705c600fb6a2b010VgnVCM100000f932a8c0>

Chiles: Chipotle and Beyond!



The chipotle pepper has proven that its spicy, smoky flavor appeals to the mass restaurateur. According to Mintel Menu Insights, the chipotle pepper recently experienced an impressive 15% growth on restaurant menus. It has been reduced, pureed and roasted, used as a flavor component of sauces and vinaigrettes, and paired with the sweet flavors of blackberry and pineapple. Undeniably, the chipotle pepper made a significant impression on the restaurant menu.

[illegible]

The Evolution of Chipotle Flavor

By Dave DeWitt

Information Source: <http://www.fierly-foods.com/dave/chipotle2.asp>

Virtually unheard of a decade ago, chipotle chiles have recently powered their way into the Fiery-Foods and Barbecue Industries. Because of their unique flavor profile—heat plus smoky overtones—the chipotle is unique in the industry as an ingredient in a growing number of restaurant dishes, food service products, and fiery specialty foods.

"Once upon a time the term chipotle was esoteric," says chile wholesaler Gary Brooks, known to his culinary customers as The Chile Guy. "But now billion-dollar suppliers that create menu products for the nation's largest restaurant chains are using chipotle as a staple."